

EXHIBIT L

NORTH CAROLINA
WAKE COUNTY

AFFIDAVIT OF KAREN S. EWART
SUMMARIZING NAMED PLAINTIFFS' AND VACATUR COURT FILES

I, Karen S. Ewart, being duly sworn, depose and say:

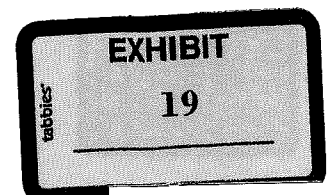
1. I am a citizen and resident of Wake County, North Carolina. I am over the age of 18, am under no disability, and am competent to testify as to those matters which are the subject of this affidavit.

2. This affidavit summarizes the methods by which I reviewed and summarized "PDF" copies of documents provided to me by the North Carolina Justice Center. It was represented to me that these documents were copies of images of papers filed in North Carolina civil actions brought by Portfolio Recovery Associates, LLC.

3. I was provided with PDF files, organized in files matching the file numbers listed on "List of Files--Named Plaintiffs' and Vacatur Court Files." A copy of this List is attached as Exhibit A.

4. I reviewed each file and provided a summary of what I saw by entering data on an Excel Spreadsheet. A blank spreadsheet, populated only with column headings, was given to me by the Justice Center. The spreadsheet had the same column headings as the spreadsheet I used in preparing the summary for the "Eight County Sample." In preparing the summary for the "Named Plaintiffs' and Vacatur Court Files," I followed the same procedure as described in Paragraph Four of my affidavit regarding the summary of the "Eight County Sample."

5. A completed copy of the spreadsheet, entitled "Chart Summarizing Named Plaintiffs' and Vacatur Court Files" is attached to this Affidavit as Exhibit B. Each row of the spreadsheet



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on Exhibit B contains the data I obtained by reviewing the PDF files matching the file number appearing on the spreadsheet.

FURTHER AFFIANT SAYETH NAUGHT.

This the 7 day of November, 2016.



Karen S. Ewart

STATE OF NORTH CAROLINA

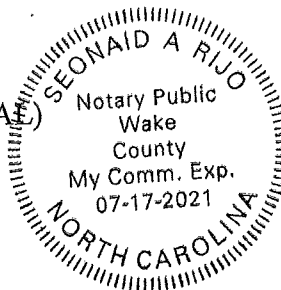
COUNTY OF WAKE

Subscribed and sworn to (or affirmed) before me,

this the 7th day of November, 2016.


NOTARY PUBLIC

(SEAL)



My Commission Expires: 7.17.16.

List of Files
Named Plaintiffs' and Vacatur Court Files

1. Pounds, Iris (Durham 15-CVD-4120)
2. Miller, Carlton (Durham 14-CVD-2019)
3. Sayaphet-Tyler, Vilayuan (Guilford 15-CVD-5238).
4. Sayaphet-Tyler, Vilayuan (Guilford 15-CVD-9301)
5. Hall, Rhonda (Mecklenburg 15-CVD-1907)
6. Townes, Pia N. (Mecklenburg 15-CVD-1909)
7. Brady, Robert (Chatham 15-CVD-44)
8. Pledger, Angela (Mecklenburg 14-CVD-22008)
9. Peach, Reba (Wake 15-CVD-4745)
10. Spector, Shari (Mecklenburg 14-CVD-22005)
11. Walls, Lisa (Mecklenburg 15-CVD-15284)
12. Walters, Robert (Mecklenburg 15-CVD-2893)

EXHIBIT
A (to Ex 19)

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CHART SUMMARIZING NAMED PLAINTIFFS' AND VACATUR COURT FILES

County	File No.	Defendant Name	Complaint Filing Date	Date Default Judgment Entered	Default Judgment Entered by Clerk or Judge	Default Judgment Amount	Number of Account Statements	Purchases	Cash Advance/Balance Transfers	Fees	Interest/Finance Charges	Total Amount Itemized	Judgment Amount Equal to or Less than Amount Itemized ?
Chatham	15CVD44	Brady, Robert Jr.	1/14/2015	2/25/2015	Clerk	\$1,944.26	2			\$87.00		\$87.00	NO
Mecklenburg	15CVD1907	Hall, Rhonda	1/30/2015	7/8/2015	Clerk	\$1,626.77	2			\$35.00	\$27.64	\$62.64	NO
Durham	14CVD2019	Miller, Carlton	2/7/2014	5/2/2014	Judge	\$1,191.76	3			\$72.00	\$19.78	\$91.78	NO
Wake	15CVD4745	Peach, Reba	4/10/2015	5/28/2015	Clerk	\$3,188.93	2	\$479.29			\$48.03	\$527.32	NO
Mecklenburg	14CVD22008	Pledger, Angela	11/26/2014	1/29/2015	Clerk	\$1,278.66	2			\$35.00		\$35.00	NO
Durham	15CVD4120	Pounds, Iris	8/5/2015	10/12/2015	Clerk	\$1,089.28	2			\$35.00	\$18.45	\$53.45	NO
Guilford	15CVD5238	Sayaphet-Tyler, Vilayuan	4/27/2015	7/2/2015	Clerk	\$4,434.88	2	\$39.49			\$83.69	\$123.18	NO
Guilford	15CVD9301	Sayaphet-Tyler, Vilayuan	11/2/2015	1/8/2016	Clerk	\$2,861.87	2			\$35.00	\$116.41	\$151.41	NO
Mecklenburg	15CVD22005	Spector, Shari	11/26/2014	4/1/2015	Clerk	\$2,777.28	2			\$70.00	\$28.79	\$98.79	NO
Mecklenburg	15CVD1909	Townes, Pia N.	1/30/2015	4/1/2015	Clerk	\$1,866.90	2			\$35.00	\$57.67	\$92.67	NO
Mecklenburg	15CVD15284	Walls, Lisa	8/17/2015	10/7/2015	Clerk	\$2,550.80	2			\$70.00	\$43.67	\$113.67	NO
Mecklenburg	15CVD2893	Walters, Robert W.	2/12/2015	6/12/2015	Clerk	\$2,572.00	2				\$42.42	\$42.42	NO

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EXHIBIT
B (to Ex 19)

Tablet

County	File No.	Defendant Name	Original Creditor (O.G.) Affidavit?	O.G. Affiant Name and Date	O.G. Affidavit References or Attaches Account Statements?	Affidavit by PRA Employee?	PRA Affiant Name and Date	PRA Affidavit References or Attaches Account Statements?
Chatham	15CVD44	Brady, Robert Jr.	NO			YES	Larry J. Andrews 12/15/2014	NO
Mecklenburg	15CVD1907	Hall, Rhonda	YES	Diane Stone 4/12/2013	NO	YES	Meryl Dreano 12/30/2014	NO
Durham	14CVD2019	Miller, Carlton	NO			YES	Cynthia Clarke 8/7/2013	NO
Wake	15CVD4745	Peach, Reba	NO			YES	Dianna D. Williams 12/15/2014	NO
Mecklenburg	14CVD22008	Pledger, Angela	NO			YES	Evita Rodriguez 8/7/2014	NO
Durham	15CVD4120	Pounds, Iris	NO			YES	Donna Dangerfield 5/21/2015	NO
Guilford	15CVD5238	Savaphet, Tyler, Vilayuan	NO			YES	Crystal Grace 2/27/2015	NO
Guilford	15CVD9301	Savaphet, Tyler, Vilayuan	NO			YES	Dianna D. Williams 9/10/2015	NO
Mecklenburg	15CVD22005	Spector, Shari	NO			YES	Anita Bray 12/15/2014	NO
Mecklenburg	15CVD1909	Townes, Pia N.	NO			YES	Michael La Douceur 5/12/2014	NO
Mecklenburg	15CVD15284	Walls, Lisa	YES	Diane Stone 5/23/2013	NO	YES	Dwayne E. Davis 12/15/2014	NO
Mecklenburg	15CVD2893	Walters, Robert W.	NO			YES	Cristina Patterson 4/16/2015	NO

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County	File No.	Defendant Name	Law Firm Representing PRA	Attorney Affidavit?	Attorney Affiant and Date	Attorney Affidavit Asserts Debt?	Attorney Affidavit Asserts OG Credit Account?	Attorney Affidavit Asserts Use of Credit Card?	Attorney Affidavit Asserts Account Statement Provide Itemization?
Chatham	15CVD44	Brady, Robert Jr.	Sessoms & Rogers, P.A.	YES	Chelsea E. Uhlman 2/20/2015	YES	YES	YES	YES
Mecklenburg	15CVD1907	Hall, Rhonda	Sessoms & Rogers, P.A.	YES	Andrew E. Hoke 7/8/2015	YES	NO	YES	YES
Durham	14CVD2019	Miller, Carlton	Sessoms & Rogers, P.A.	YES	Kauffman, Amber K. 3/20/2014	YES	YES	YES	YES
Wake	15CVD4745	Peach, Reba	Sessoms & Rogers, P.A.	YES	Uhlman, Chelsea E. 5/28/2015	YES	YES	YES	YES
Mecklenburg	14CVD22008	Pledger, Angela	Sessoms & Rogers, P.A.	YES	Uhlman, Chelsea E. 1/29/2015	YES	YES	YES	YES
Durham	15CVD4120	Pounds, Iris	Sessoms & Rogers, P.A.	YES	Meyers, Mitchell A. 10/12/2015	YES	NO	YES	YES
Guilford	15CVD5238	Sayaphet-Tyler, Vilayuan	Sessoms & Rogers, P.A.	YES	Uhlman, Chelsea E. 6/23/2015	YES	YES	YES	YES
Guilford	15CVD9301	Sayaphet-Tyler, Vilayuan	Sessoms & Rogers, P.A.	NO					
Mecklenburg	15CVD22005	Spector, Shari	Sessoms & Rogers, P.A.	YES	Uhlman, Chelsea E. 4/1/2015	YES	YES	YES	YES
Mecklenburg	15CVD1909	Townes, Pia N.	Sessoms & Rogers, P.A.	YES	Uhlman, Chelsea E. 4/1/2015	YES	YES	YES	YES
Mecklenburg	15CVD15284	Walls, Lisa	Sessoms & Rogers, P.A.	YES	Uhlman, Chelsea E. 10/7/2015	YES	NO	YES	YES
Mecklenburg	15CVD2893	Walters, Robert W.	Sessoms & Rogers, P.A.	YES	Meyers, Mitchell A. 6/12/2015	YES	YES	YES	YES

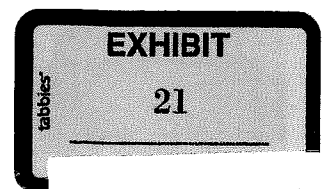
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SUMMARY OF NAMED PLAINTIFFS' AND VACATUR COURT FILES: AUTHENTICATION						
County	File No.	Defendant Name	Original Creditor (O.C.) Affidavit?	O.C. Affidavit References or Attaches Account Statements?	Affidavit by PRA Employee?	PRA Affidavit References or Attaches Account Statements?
Chatham	15CVD44	Brady, Robert Jr.	NO		YES	NO
Mecklenburg	15CVD1907	Hall, Rhonda	YES	NO	YES	NO
Durham	14CVD2019	Miller, Carlton	NO		YES	NO
Wake	15CVD4745	Peach, Reba	NO		YES	NO
Mecklenburg	14CVD22008	Pledger, Angela	NO		YES	NO
Durham	15CVD4120	Pounds, Iris	NO		YES	NO
Guilford	15CVD5238	Sayaphet-Tyler, Vilayuan	NO		YES	NO
Guilford	15CVD9301	Sayaphet-Tyler, Vilayuan	NO		YES	NO
Mecklenburg	15CVD22005	Spector, Shari	NO		YES	NO
Mecklenburg	15CVD1909	Townes, Pia N.	NO		YES	NO
Mecklenburg	15CVD15284	Walls, Lisa	YES	NO	YES	NO
Mecklenburg	15CVD2893	Walters, Robert W.	NO		YES	NO



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SUMMARY OF NAMED PLAINTIFFS' AND VACATUR COURT FILES: ITEMIZATION					
County	File No.	Defendant Name	Default Judgment Amount	Total Amount Itemized	Judgment Amount Equal to or Less than Amount Itemized ?
Chatham	15CVD44	Brady, Robert Jr.	\$1,944.26	\$87.00	NO
Mecklenburg	15CVD1907	Hall, Rhonda	\$1,626.77	\$62.64	NO
Durham	14CVD2019	Miller, Carlton	\$1,191.76	\$91.78	NO
Wake	15CVD4745	Peach, Reba	\$3,188.93	\$527.32	NO
Mecklenburg	14CVD22008	Pledger, Angela	\$1,278.66	\$35.00	NO
Durham	15CVD4120	Pounds, Iris	\$1,089.28	\$53.45	NO
Guilford	15CVD5238	Sayaphet-Tyler, Vilayuan	\$4,434.88	\$123.18	NO
Guilford	15CVD9301	Sayaphet-Tyler, Vilayuan	\$2,861.87	\$151.41	NO
Mecklenburg	15CVD22005	Spector, Shari	\$2,777.28	\$98.79	NO
Mecklenburg	15CVD1909	Townes, Pia N.	\$1,866.90	\$92.67	NO
Mecklenburg	15CVD15284	Walls, Lisa	\$2,550.80	\$113.67	NO
Mecklenburg	15CVD2893	Walters, Robert W.	\$2,572.00	\$42.42	NO



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SUMMARY OF NAMED PLAINTIFFS' AND VACATUR COURT FILES: SESSOMS ATTORNEY AFFIDAVITS

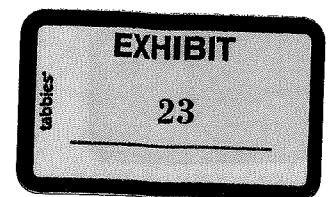
County	File No.	Defendant Name	Law Firm Representing PRA	Attorney Affidavit?	Attorney Affidavit Asserts OC Opened Credit Account?	Attorney Affidavit Asserts Use of Credit Card?	Attorney Affidavit Asserts Account Statement Provide Itemization?	Attorney Affidavit Asserts Account Statement Provide Itemization?
Chatham	15CVD44	Brady, Robert Jr.	Sessoms	YES	YES	YES	YES	YES
Mecklenburg	15CVD1907	Hall, Rhonda	Sessoms	YES	YES	NO	YES	YES
Durham	14CVD2019	Miller, Carlton	Sessoms	YES	YES	YES	YES	YES
Wake	15CVD4745	Peach, Reba	Sessoms	YES	YES	YES	YES	YES
Mecklenburg	14CVD22008	Pledger, Angela	Sessoms	YES	YES	YES	YES	YES
Durham	15CVD4120	Pounds, Iris	Sessoms	YES	YES	NO	YES	YES
Gulfford	15CVD5238	Sayaphet-Tyler, Vilayuan	Sessoms	YES	YES	YES	YES	YES
Gulfford	15CVD9301	Sayaphet-Tyler, Vilayuan	Sessoms	NO				
Mecklenburg	15CVD22005	Spector, Shari	Sessoms	YES	YES	YES	YES	YES
Mecklenburg	15CVD1909	Townes, Pia N.	Sessoms	YES	YES	YES	YES	YES
Mecklenburg	15CVD15284	Walls, Lisa	Sessoms	YES	YES	NO	YES	YES
Mecklenburg	15CVD2893	Walters, Robert W.	Sessoms	YES	YES	YES	YES	YES

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AUTHENTICATING AFFIDAVITS



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NORTH CAROLINA
WAKE COUNTY

AFFIDAVIT OF SEONAI A. RIJO
AUTHENTICATING CASE FILES

Seonaid A. Rijo, being duly sworn, deposes and says:

1. I am a senior litigation paralegal at the North Carolina Justice Center. I give this affidavit in the belief that it presents matters that are undisputed, as it concerns solely the contents of court file copied at the Chatham County Clerk of Court's Office.
2. On August 31, 2015, I visited the office of the Wake County Clerk of Court where I retrieved and scanned the contents of the case file *Portfolio Recovery Associates, LLC v. Reba Peach* (15-CVD-4745).
3. On October 28, 2015, I visited the office of the Chatham County Clerk of Court where I retrieved and scanned the contents of the case file *Portfolio Recovery Associates, LLC v. Robert Brady* (15-CVD-44).
4. The court files described above were copied into an electronic file using a Fujitsu Scansnap iX-500 portable document scanner. I scanned the complete files as of the date of copying.
5. I saved the contents of the scanned court files in pdf. format onto a computer provided to me by the North Carolina Justice Center.
6. The files for the cases listed above that are included in the Exhibits in Support of Plaintiffs' Motion for Preliminary Injunction and Class Certification are true, accurate, and

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complete copies of the files as maintained by the Clerks of Court for the foregoing counties, as of the dates set out above.

FURTHER AFFIANT SAYETH NAUGHT.

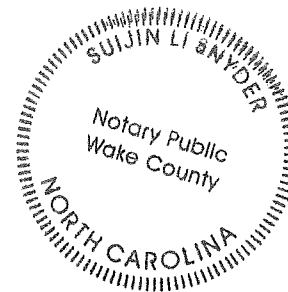
This the 7th day of November, 2016.

Seonaid A. Rijs
SEONAI D A. RIJO

STATE OF NORTH CAROLINA
COUNTY OF WAKE

Subscribed and sworn to (or affirmed) before me,
this the 7 day of November, 2016.

Sijin Li Snyder (SEAL)
NOTARY PUBLIC



My Commission Expires: 9.11.17.

NORTH CAROLINA
WAKE COUNTY

AFFIDAVIT OF COUNSEL (HARTZELL)
AUTHENTICATING CASE FILES

J. Jerome Hartzell, Esq., being duly sworn, deposes and says:

1. I am an attorney licensed to practice law in North Carolina. I give this affidavit in the belief that it presents matters that are undisputed, as it solely concerns authentication of court files copied at the Mecklenburg Clerk of Court's office in North Carolina.

2. On January 21, 2016, I visited the office of the Mecklenburg County Clerk of Court where I retrieved and scanned the contents of the court file for *Portfolio Recovery Associates, LLC v. Lisa Walls* (15-CVD-15284).

3. On February 11, 2016, I visited the office of the Mecklenburg County Clerk of Court where I retrieved and scanned the contents of the court files for *Portfolio Recovery Associates, LLC v. Shari Spector* (14-CVD-22005) and *Portfolio Recovery Associates, LLC v. Angela Pledger* (14-CVD-22008).

4. The court files described above were copied into an electronic file using a Fujitsu Scansnap iX-500 portable document scanner. I scanned the complete file as of the date of copying.

5. The files for the cases listed above that are included in the Exhibits in Support of Plaintiffs' Motion for Preliminary Injunction and Class Certification are true, accurate, and complete copies of the files as maintained by the Clerk of Court, as of the dates set out above.

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FURTHER AFFIANT SAYETH NAUGHT.

This the 7th day of November, 2016.

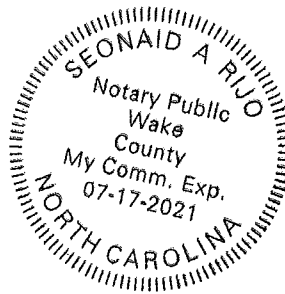

J. JEROME HARTZELL

STATE OF NORTH CAROLINA
COUNTY OF WAKE

Subscribed and sworn to (or affirmed) before me,
this the 7th day of November, 2016.

 (SEAL)
NOTARY PUBLIC

My Commission Expires: 7.17.21.



AFFIDAVIT OF NICHOLAS PEARRE HOLT

I, Nicholas Pearre Holt, being duly sworn, depose and say:

1. I am a citizen and resident of Mecklenburg County, North Carolina. I am over the age of 18, am under no disability, and am competent to testify as to those matters which are the subject of this affidavit.
2. This affidavit summarizes the methods by which I obtained a copy of a file at the Mecklenburg County Clerk of Court's office.
3. On February 23, 2016, I visited the office of the Clerk of Court for Mecklenburg County. I photocopied the contents of the following court file: *Portfolio Recovery Associates, LLC., v. Robert W. Walters*, 15 CVD 2893.
4. I then returned with the copies to the offices of Legal Services of Southern Piedmont at 1431 Elizabeth Avenue, Charlotte, NC 28204 and scanned them.
5. The scanned files were saved as .pdf files on Legal Services of Southern Piedmont's case management system.

AFFIANT FURTHER SAYETH NAUGHT.

This the 2nd day of NOVEMBER, 2016.

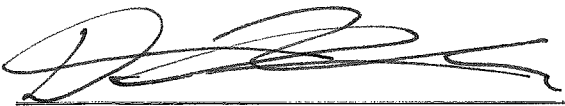


STATE OF NORTH CAROLINA

COUNTY OF Mecklenburg

SWORN to and subscribed before me,

this the 2 day of November, 2016.


(SEAL)
NOTARY PUBLIC

My Commission Expires: May 31, 2021

AFFIDAVIT OF LEAH A. KANE

I, Leah A. Kane, being duly sworn, depose and say:

1. I am a citizen and resident of Mecklenburg County, North Carolina. I am over the age of 18, am under no disability, and am competent to testify as to those matters which are the subject of this affidavit.
2. On February 25, 2016, I emailed a .pdf file saved on Legal Services of Southern Piedmont's server and case management system containing a copy of the Clerk of Court for Mecklenburg County file for *Portfolio Recovery Associates, LLC., v. Robert W. Walters*, 15 CVD 2893 to Carlene McNulty at the North Carolina Justice Center.

AFFIANT FURTHER SAYETH NAUGHT.

This the 2nd day of November, 2016.

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

SWORN to and subscribed before me,

this the 2nd day of NOVEMBER, 2016.

Nicholas Pearce Holt (SEAL)
NOTARY PUBLIC

My Commission Expires: MAY 4, 2020

